

EXHIBIT 3

exhibit 3.1

June 4, 2005

Office of the Chief Trial Counsel/Intake
State Bar of California
1149 South Hill Street
Los Angeles, CA 90015-2299

Dear Chief Trial Counsel:

Declaration of Statement of Facts in Support of Relief Requested

Reference: Complaint Against Pamela Zimba in Oakland Superior Court
Cases 2002-046048 & 2001-023364

Please suspend Pamela Zimba's license for her fraudulent representation botching our cases purposely in covering up the defendants, and her and her associate Albert Coombes extorting legal fees in the attempt of depleting my economic resource:

Case 2002-046048 (Assault and Battery)

1. Please see exhibit 1.1 Discrepancies of Celaya courtroom, deposition, and statement testimonies, exhibit 1.2 courtroom trial transcript dated 8/5/04, exhibit 1.3 answer/cross complaint statement dated 6/3/02, exhibit 1.4 deposition dated 9/5/03, exhibit 1.5 my email dated 12/14/01. Zimba knew the fact that my son and I were being beaten up helplessly by Constance Celaya. But during trial Zimba helped Celaya falsified her testimonies making her assault/battery became self-defense. Zimba knew Celaya lied through her answer/cross complaint, 2 hours deposition, and trial testimonies, but had no intention to prove her lying.
2. Please see exhibit 2.1 of my complaint against Celaya filed with Rockridge Manor Homeowners' Association dated 12/19/01, exhibit 2.2 citizen's complaint statement filed with UC Berkeley Police Department, exhibit 2.3 citizen crime report filed with Oakland Police Department.
3. Exhibit 3.1 of first-hand eyewitnesses Gail and David Bailey who were served on 9/30/03 for deposition but failed to show up. Both our attorneys Stephen Sirota and Pamela Zimba wouldn't compel them in covering up for Celaya.

Exhibit 3.2 and 3.3 deposition subpoenas Zimba served to Officer Mitchell and Le dated 3/9/04 & 7/6/04. Exhibit 3.4 assignment card written by Officer Mitchell brought to Zimba's office during meeting. Officer Mitchell told me in the meeting that he believed we were the victims. Zimba subpoenaed the officers but determined not to take their depositions after she charged me for all the fees. During trial I found out from court that it was critical to have officers' testimonies. Zimba cheated us out of Officers testimonies in covering up for Celaya. Exhibit 3.5 slip written by Officer Le who promised to prepare police report for pick up but never prepared the report. Also on exhibit 3.5 were my notes of factual occurrences of Celaya's assault/battery and my contacting police departments. Exhibit 3.6 City of Oakland Investigation Dept info request. Exhibit 3.7 Oakland Police Department Follow-Up Investigation Report.

Exhibit 3.8 subpoena to Dr. Behravan who didn't showed up to depo, trial, or bring medical records. Please see exhibit 1.1, page8, on how Zimba cheated me out of doctor's testimonies and medical records.

4. Constance Celaya and Mike Solomon were able to corrupt all our attorneys sabotaging our complaints against the board of directors of homeowner association and Constance Celaya's assault/battery.

Please see Exhibit 4.1 my complaint against Zimba dated 4/26/05, 2/7/05, 11/1/04, 10/2/04, and against her associate, Albert Coombes (dated 12/18/04 & 1/31/05 to State Bar), Notice of Association of Counsel for Coombes filed 8/26/04 (2 weeks before trial on 9/10/04), Coombes falsified accounting.

Exhibit 4.2 complaint against Stephen Sirota. Exhibit 4.3 complaint against Brett Allen Exhibit 4.4 Superior Court Proceeding filed by brett Allen with handwriting of Celaya depo schedule on Friday, but was never taken).

Exhibit 4.5 my request to Zimba to compare Celaya's answer/cross complaint and deposition transcript. I made countless requests for Zimba to verify Celaya lying in both her complaint and depo, but Zimba was determined to botch the case to cover up for Celaya.

Zimba was well aware of the problems we encountered with our previous attorneys, but nevertheless, she decided to ultimately carry out the task in botching our cases completely. She charged me subpoenaing doctor, record, policemen, and third party witnesses, but brought no testimonies or records to prove our case. Zimba fraudulently represented the assault/battery case as if we were the assailants, causing us to lose the only chance for damage recovery.

After Zimba purposely botched the assault/battery case on 8/5/04 she withheld the judgment until 8/20/04. When I asked her to appeal and bring in all witnesses for depo, she distracted me of her wrongdoing and appeal deadline by having us taking more than half a dozen defense depositions for homeowner association case (2001-023364), subpoenaing a dozen of our doctors, pressuring for Albert Coombes' hiring and legal fees, and intentionally not notifying me of the 30 days appeal deadline.

5. Zimba also lied to me about the "None-Suit" judgment. On 8/20/04 Zimba released the "none-suit" judgment to me and I asked her for the meaning. Zimba answered that it meant "nobody wins" and "nobody owes anything to the other party". Please see exhibit 5.1, case summary (#2002-046048) dated 8/11/04 that the trial judgment was for defendant.

Case 2001-023364 (Rockridge Manor Homeowners Association)

6. Exhibit 4.1, dated 4/26/05, Item 1(c), regarding how Zimba purposely drove my son to the verge of mental breakdown to distract me from her botching the assault/battery case on 8/5/04, and the 30 days appeal deadline.
7. Exhibit 4.1, my letters to Zimba dated 2/7/05, 11/1/04, 10/2/04, requesting the

homeowners association settlement be expedited and monthly accountings prepared. Zimba would not accept my certified mails of these letters and I had to hand-deliver all three letters to her.

Exhibit 6.1, Zimba falsified accounting. On 11/23/04, my meeting with Zimba who told me there wasn't any attorney preparing monthly accountings, then, she provided accountings covering from June through November 2004 (page 11) charging me the total amount of \$51,000 I already paid her (including Zimba personal retainer \$33000, Albert Coombs retainer \$7500, expert witness retainers \$10500), with a balance of my owing her for \$2176.61. Exhibit 4.1, dated 4/26/05, page 6, my complaint to Zimba regarding her falsified accountings and refund of her botching the case. Exhibit 6.2 Zimba deducted \$2176.61 from the sum of settlement we received from the defense insurance company.

At the 2/7/05 settlement hearing Zimba was still trying to jeopardize the settlement approval by using the excuse of Guardian Ad Litem's absence. I informed Zimba that if the settlement didn't go through on 2/7/05, I would immediately file substitution of attorney and lien against her for the settlement's principal/interest starting 9/3/04. I believe it was my decision of substituting and filing lien against her to finally prompt her to allow the settlement go through.

Exhibit 5.2, case summary (case #2001-023364). After 9/3/04 we reached settlement agreement with the defense, and 2/7/05 the settlement approval by court, Zimba continued attending hearings until April 2005 in the attempt of tying my hand from filing complaints against her.

8. Exhibit 6.3 Dr. Fred Rosenthal accounting recorded his meeting with Zimba for 1 hour. Exhibit 6.1 Zimba's accounting dated 8/9/04 showed her meeting with Dr. Rosenthal for 3 hours. Zimba had falsified her accountings to charge up \$51000 plus \$2176.61 balance she hadn't earned. Especially since our case settled on 9/3/04, Zimba and Coombs didn't prepare for trial from 9/3/04 thru 9/10/04, or take depo of expert witnesses, or attend trial on 9/10/04 for a week.
9. My son sustains severe psychological injuries caused by these defendants' harassment and assault and battery. Ever since their:
 1. September 2000 calling the social service and police framing my son being dangerous and violent and having a gun (case #2001-023364).
 2. Influencing Celaya's assault and battery on 12/10/01 and scores of homeowners' hatred toward us.
 3. Continuing with their jointed harassment and stalking until we moved out of Rockridge Manor Condo in September 2003.

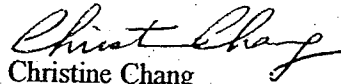
These defendants have aggravated my son's mental disability causing his medication increase from taking 1 to 3 mg of one medication a day, to taking 5 different medications everyday with maximum dosages. He is constantly paranoid of our living environment and people, and couldn't live a normal life ever since September 2000 and 12/10/01. He is regularly using ear plugs and portable stereo blasting music into his ears to block all noises from the apartment building, and is afraid of people and traffic at where we live.

10. I sustain mental angrish and serious physical injuries from Celaya's assault and battery. Please see exhibit 7.1 of my initial symptom of pain around waist. Exhibit 8.2 of back & waist pain required CT Scan. Exhibit 8.3 CT Scan for pain in upper and lateral abdomen. exhibit 8.4 back and front pain. Exhibit 8.5 acute low back pain. Exhibit 8.6 Dr. Behravan examination. Exhibit 8.7 MRI Open Scan. Exhibit 8.8 Healthsouth Physical Therapy. Exhibit 8.9 Steroid Injections. Exhibit 8.91 Facesheet with Problems. Exhibit 9.1 Dr. Rovner Report medical records.

Please advise what action you'll be taking in disciplining Pamela Zimba, and what are our legal rights and remedies available. Thank you very much for your assistance.

I, Christine Chang, make the declaration of facts in support of the relief requested by me. I make this declaration under penalty of perjury under the laws of the State of California. Executed in Alameda on 6/4/05.

Sincerely yours,



Christine Chang

Plaintiff of Case 2001-023364 & 2002-046048

attachment